

CUNNINGHAM BOUNDS, LLC  
Steven L. Nicholas (*admitted pro hac vice*)  
sln@cunninghambounds.com  
Lucy E. Tufts (*admitted pro hac vice*)  
let@cunninghambounds.com  
1601 Dauphin Street  
Mobile, AL 36604  
Telephone: (251) 471-6191  
Facsimile: (251) 479-1031

KILBORN LAW, LLC  
Benjamin H. Kilborn, Jr. (*admitted pro hac vice*)  
benk@kilbornlaw.com  
P.O. Box 2164  
Fairhope, AL 36533  
Telephone: (251) 929-4620

MORGAN & MORGAN  
COMPLEX LITIGATION GROUP  
Michael F. Ram (SBN 104805)  
mram@forthepeople.com  
Marie N. Appel (SBN 187483)  
mappel@forthepeople.com  
711 Van Ness Avenue, Suite 500  
San Francisco, CA 94102  
Telephone: (415) 358-6913  
Facsimile: (415) 358-6293

*Attorneys for Plaintiffs and the Putative Class*

MORRISON & FOERSTER LLP  
PENELOPE A. PREOVOLOS (SBN 87607)  
PPreovolos@mofo.com  
CLAUDIA M. VETESI (SBN 233485)  
CVetesi@mofo.com  
ALEXIS A. AMEZCUA (SBN 247507)  
AAmezcua@mofo.com  
MORRISON & FOERSTER LLP  
425 Market Street  
San Francisco, California 94105-2482  
Telephone: 415.268.7000

ERIN M. BOSMAN (SBN 204987)  
EBosman@mofo.com  
12531 High Bluff Drive Suite 100  
San Diego, California 92130-2040  
Telephone: 858.720.5100  
Facsimile: 858.720.5125

*Attorneys for Defendant Apple Inc.*

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**OAKLAND DIVISION**

CHRIS SMITH, CHERYL SMITH, KAREN  
SMITHSON, FRANK ORTEGA, ALBERTO  
CORNEA, MICHELLE ROGERS, DEBORAH  
CLASS, AMBER JONES, ALEXIS KEISER,  
LOORN SAELEE, THOMAS PEAR, and  
TANNAISHA SMALLWOOD individually and  
on behalf of all other similarly situated  
individuals,

Plaintiffs,

v.

APPLE INC.,

Defendant.

Case No. 4:21-cv-09527 HSG

**JOINT SUBMISSION OF  
STIPULATED SETTLEMENT  
SCHEDULE PURSUANT TO  
OCTOBER 25, 2024 COURT  
ORDER (ECF NO. 163) ; ORDER**

Dept.: Courtroom 2 – 4th Floor  
Judge: Hon. Haywood S. Gilliam, Jr.

2nd Am. Compl. Filed: March 17, 2023

Pursuant to the Court's October 25, 2024 preliminary approval order (ECF No. 163), and the Court's subsequent order dated November 1, 2024 (ECF No. 165), the parties have met and conferred and provide the following amended stipulated settlement deadlines together with a proposed order.

Event	Proposed Stipulated Deadline
Deadline for Settlement Administrator to mail notice to all putative Class Members (Notice Date)	January 10, 2025
Filing deadline for attorneys' fees and costs motion and incentive payment motion	January 10, 2025
Deadline for Class Members to opt-out or object to settlement and/or application for attorneys' fees and costs and incentive payment	February 24, 2025
Plaintiffs to move for final approval	March 19, 2025
Final fairness hearing and hearing on motions	April 10, 2025

Dated: November 7, 2024

CUNNINGHAM BOUNDS, LLC

By: /s/ Lucy E. Tufts  
LUCY E. TUFTS (*admitted pro hac vice*)

Attorneys for Plaintiffs,  
CHRIS SMITH, CHERYL SMITH, KAREN SMITHSON, FRANK ORTEGA, ALBERTO CORNEA, MICHELLE ROGERS, DEBORAH CLASS, AMBER JONES, ALEXIS KEISER, LOORN SAELEE, THOMAS PEAR, and TANNAISHA SMALLWORD, individually and on behalf of all other similarly situated individuals,

Dated: November 7, 2024

MORRISON & FOERSTER LLP


By: /s/ Alexis A. Amezcua  
ALEXIS A. AMEZCUA

Attorneys for Defendant  
APPLE INC.

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 11/8/2024

  
Hon. Haywood S. Gilliam, Jr.  
United States District Judge